

IN THE UNITED STATES BANKRUPTCY COURT  
Western District of Arkansas  
FAYETTEVILLE DIVISION

IN RE: Steven and Mandy Flynn, DEBTOR

CASE NO. 5:11-bk-72748  
CHAPTER 13

**MODIFICATION OF CHAPTER 13 PLAN**

COMES NOW the above named Debtor(s), and for their modification to the original or modified Chapter 13 plan states:

**1. Payment to the Trustee:**

The Debtor proposes to pay \$ PER MONTH TO THE TRUSTEE.

Indicate how often the Debtor is paid by checking the appropriate box below:

☐ weekly      ☐ semi-monthly      ☐ other: \_\_\_\_\_  
☐ bi-weekly      ☐ monthly

**2. The Plan Length:**

Increase plan length to \_\_\_\_\_ months.

Decrease plan length to \_\_\_\_\_ months.

- A debtor must pay all disposable income into the plan for the benefit of unsecured creditors for no less than 36 months (unless unsecured are being paid 100%) and the plan length shall not exceed 60 months.

**3. Unsecured Creditors** are to be paid a \_\_\_\_\_ dividend.

**4. Modified Treatment of Existing Creditors:**

The following **changes** are to be made to each creditor as set out below:

<b><u>Creditor Name</u></b>	<b><u>Change in Treatment/Classification</u></b>
(1) Compass Bank	Creditor is to receive the value of the collateral, \$17,373.66, payable at 5.25% per annum at the monthly rate of \$329.86.
(2) _____	_____
(3) _____	_____
(4) _____	_____
(5) _____	_____

**5. Addition of Secured Creditors to the Plan:**

Secured creditors who will retain their liens and be paid the value of their collateral of the amount of their debt, whichever is less, shall be paid as follows. Any amount claimed in excess of the value of the collateral will be treated as a nonpriority unsecured creditor.

\*\* Please indicate any debts which will extend beyond the length of the plan. Such debts MUST have a "monthly payment" proposed. Also, if the debt is in default, you must provide separately for such default.

	Creditor Name/Address	Net Payoff	Value	Unsecured Portion	Int rate * Pd by Plan	Monthly Payment
(1)	_____	_____	_____	_____	_____	_____
(2)	_____	_____	_____	_____	_____	_____
(3)	_____	_____	_____	_____	_____	_____
(4)	_____	_____	_____	_____	_____	_____

\*If this space is blank, no interest is to be paid.

**6. Addition of Priority Creditors to the Plan:** Such as taxes or wages.

The following creditors are added to the plan and shall be paid as follows:

	Creditor Name/Address	Per month, if any	Total Debt
(1)	_____	_____	_____
(2)	_____	_____	_____
(3)	_____	_____	_____
(4)	_____	_____	_____

**7. Addition of Unsecured Creditors to the Plan:**

The following unsecured creditors are added to the plan. Each creditor must be classified as a "PRE" or "POST" petition creditor and shall be paid as follows:

**PRE-PETITION** Unsecured creditors shall be paid a pro-rata dividend.

**POST-PETITION** Unsecured creditors shall be paid a \_\_\_\_\_ dividend.

	Creditor Name/Address	Classification	Total Debt
(1)	_____	_____	_____
(2)	_____	_____	_____
(3)	_____	_____	_____
(4)	_____	_____	_____

**8. Unsecured Creditors** shall be paid at least as much as they would receive under a Chapter 7.

**9. All other provisions remain unchanged except as provided for in addendum.**

\_\_\_\_ See attached addendum

Date: September 15, 2011

/s/ Emily J. Henson  
Attorney for Debtor  
PO Box 824  
Springdale, AR 72765-0824  
(479) 361-8770  
Fax: (888) 804-8367

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CASE NO. 5:11-bk-72748  
CHAPTER 13

**NOTICE OF OPPORTUNITY TO OBJECT TO  
MODIFIED PLAN BEFORE CONFIRMATION**

You are hereby notified that the captioned Debtor(s) has/have filed the attached modified plan pursuant to 11 U.S.C. §1323 and Rule 3015 of the Rules of Bankruptcy Procedure. Objections to confirmation of the modified plan must be filed with the Bankruptcy Court at 35 E. Mountain Street, Room 316, Fayetteville, AR 72701, in writing within 28 days from the date of this notice, with copies to the attorney for Debtor(s) and to the Standing Chapter 13 Trustee, Joyce Bradley Babin, at P.O. Box 8064, Little Rock, AR 72203.

If objections to confirmation of the modified plan are filed, they will be set by hearing by subsequent notice. If no objections are received, the plan as modified may be confirmed without further notice or hearing.

RESPECTFULLY SUBMITTED,

Steven and Mandy Flynn

Date: September 15, 2011

/s/ Emily J. Henson  
Emily J. Henson, AR#2006124  
PO Box 824  
Springdale, AR 72765-0824  
(479) 361-8770  
Fax: (888) 804-8367

CERTIFICATE OF MAILING

I, the abovesigned, hereby certify that copies of the foregoing notice and attached Modified Chapter 13 Plan have been mailed to or electronically delivered to:

Chapter 13 Trustee  
Joyce Bradley Babin, Trustee  
P.O. Box 8064  
Little Rock, AR 72203

Internal Revenue Services  
PO Box 7346  
Philadelphia, PA 19101-7346

Dept. of Finance & Administration  
Legal Division  
P.O. Box 3628  
Little Rock, AR 72203

U.S. Attorney Western District  
P.O. Box 1524  
Fort Smith, AR 72902

Employment Security Division  
Legal Division  
P.O. Box 2981  
Little Rock, AR 72203

U.S. Attorney, Eastern District  
P.O. Box 122  
Little Rock, AR 72203

and to all of the creditors whose name and addresses are set forth on the following page(s):

AES  
PO Box 2461  
Harrisburg, PA 17101

Bankcard Services  
PO Box 84013  
Columbus, GA 31908-4013

Best Buy  
PO Box 15521  
Wilmington, DE 19850-5521

Chase  
PO Box 94014  
Palatine, IL 60094-4014

Chrysler Financial  
PO Box 9001921  
Louisville, KY 40290-1921

Citi/Ashley Furniture Homestor  
PO Box 22060  
Tempe, AZ 85285-2060

Compass Bank  
PO Box 192  
Birmingham, AL 35201-0192

CPU/ Citibank CBSDNA  
PO Box 6003  
Hagerstown, MD 21747-6003

Discover  
PO Box 30395  
Salt Lake City, UT 84130-0395

GE Money Bank / Ashley Furnitu  
PO Box 960061  
Orlando, FL 32896-0061

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

JC Penney  
PO Box 960001  
Orlando, FL 32896

Justice  
PO Box 659728  
San Antonio, TX 78265-9728

LCA Collections  
PO Box 2240  
Burlington, NC 27216-2240

Mercy Medical Center  
PO Box 504664  
Saint Louis, MO 63150-4664

Mercy Medical Clinics NWA  
PO Box 504891  
Saint Louis, MO 63150-4891

NCO Financial Systems  
PO Box 15372  
Wilmington, DE 19850

Old Navy  
PO Box 103065  
Roswell, GA 30076

Pinnacle Women's Health Care  
PO Box 504303  
Saint Louis, MO 63150-4303

Regions Mortgage  
PO Box 1860 Dept. 2520  
Birmingham, AL 38101

Sams  
P.O. Box 105980  
Atlanta, GA 30353

SE Emergency Physicians  
PO Box 740023  
Cincinnati, OH 45274-0023

St. Mary's Hospital  
PO Box 504276  
Saint Louis, MO 63150-4276

State of Arkansas Dept. of Fin  
PO Box 1272  
Little Rock, AR 72201

Target  
PO Box 660170  
Dallas, TX 75266-0170

Tiburon Financial  
PO Box 10050  
Fayetteville, AR 72703

US Bank  
PO Box 790408  
Saint Louis, MO 63179-0408

Wells Fargo Mortgage  
PO Box 1225  
Charlotte, NC 28201-1225

Western Federal Credit Union  
PO Box 10018  
Manhattan Beach, CA 90267-7518

Zales  
Processing Center  
Des Moines, IA 50364-0001